

KAUFMAN DOLOWICH LLP

Iram P. Valentin, Esq. (Attorney No. 01022-2002)
Kaitlin R. Principato, Esq. (Attorney No. 43434-2023)
Court Plaza North
25 Main Street, Suite 500
Hackensack, New Jersey 07601
Telephone: (201) 488-6655
ivalentin@kaufmandolowich.com
kaitlin.principato@kaufmandolowich.com
Attorneys for Defendant, BNK Invest, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SPENCER SAVINGS BANK, S.L.A.,

Plaintiff,

v.

BNK INVEST, INC., ROBERT SEPERSKY,
JONATHAN GOLDMAN, RONALD
RAGANELLA, ROBERT MITCHELL, WILLIAM
R. DOSSENBACH, JORDAN FARKAS, HARVEY
SCHAFFLER, LEVI C. PUREC, TIMOTHY J.
KLACE, KENNETH METVINER, LAWRENCE
SEIDMAN, BRAD D. BUTLER, RICHARD J.
LASHLEY, JOHN H. MEREY, LEO M.
GOLDNER, MARK A. GOLDSTEIN, MICHAEL
D. ABNERI, and JOHN DOES 1–4

Defendants.

Civil Action

**Docket No. 2:25-cv-03877-MEF-JRA
NOTICE OF MOTION TO DISMISS
THE PLAINTIFF'S COMPLAINT
PURSUANT TO F.R.C.P. 12(b)(6)**

To: Joseph N. Froehlich, Esq.
Troutman Pepper Locke LLP
305 Church at North Hills Street, Suite 1200
Raleigh, NC 27609
Attorneys for Plaintiff

Frank Scaduto, Esq.
Wiley Rein, LLP
2050 M Street NW
Washington, D.C. 20036

PLEASE TAKE NOTICE that on Friday, August 4, 2025 at 9:00 a.m. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant, BNK Invest Inc. (hereinafter “BNK Invest”), Kaufman Dolowich LLP, shall move before the Honorable Michael E. Farbiarz, U.S.D.J., United States District Court for the District of New Jersey, Martin Luther King, Jr. Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an order pursuant to F.R.C.P. 12(b)(6) dismissing Plaintiff’s Complaint.

Oral argument is requested if this motion is opposed. BNK Invest will rely upon the within Notice of Motion, Certification of Counsel with Exhibits, Memorandum of Law, and Proposed Order in support of this motion.

We hereby certify that the original of the within notice of motion has been filed electronically via ECF, and that a copy of same has been transmitted to all counsel of record.

Kaufman Dolowich LLP
Attorneys for Defendant, BNK Invest, Inc



Dated: June 23, 2025
Hackensack, New Jersey

Kaitlin R. Principato, Esq.